

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	

**REPLY COMMENTS OF
TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.**

September 21, 2004

TABLE OF CONTENTS

INTRODUCTION	1
I. THE JOINT BOARD’S RECOMMENDATION TO LIMIT SUPPORT TO PRIMARY LINES SHOULD BE REJECTED	3
II. SUPPORT FOR COMPETITIVE ETCs (CETCS) SHOULD BE BASED UPON CETC’S COSTS, NOT ILEC’S COSTS.....	5
III. THE COMMISSION SHOULD ADOPT THE JOINT BOARD’S PROPOSED GUIDELINES AS MANDATORY REQUIREMENTS FOR ETC DESIGNATION AS WELL AS THREE ADDITIONAL REQUIREMENTS	8
1. Adequate Financial Resources	8
2. Commitment and Ability to Provide the Supported Services	9
3. Ability to Remain Functional in Emergency Situations.....	10
4. Consumer Protection.....	10
5. Local Usage.....	11
6. The Applicant Must Demonstrate Its Commitment to Utilize the Funding It Receives Only to support Infrastructure and Supported Services Within the ETC Designated Service Area.....	11
7. The Impact of the Designation on the Size and Sustainability of the Universal Service Fund Must be considered.	12
8. Regulators Must Continue to Analyze Whether or Not ETC Designation Would Create the Potential for Rural Creamskimming.....	12
IV. TSTCI OPPOSES ANY ETC DESIGNATION PROCESS THAT ADVERSELY IMPACTS THE RIGHTS OF AN INTERESTED PARTY TO PARTICIPATE IN A PROCEEDING.....	14
V. THE BASE OF USF CONTRIBUTORS SHOULD BE EXPANDED	14
VI. SUMMARY	15

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INTRODUCTION

Please accept these reply comments of Texas Statewide Telephone Cooperative, Inc. ("TSTCI"), filed in the above-captioned proceeding. TSTCI is an association representing 36 small, rural telephone companies and cooperatives in Texas (please see Attachment 1).

In this proceeding, the Commission is faced with several important decisions that are intended to ensure the long-term sustainability of the universal service fund (USF), maintain competitive neutrality, while preserving and advancing universal service. The Commission is about to determine whether or not limiting high-cost support to a single connection is a proper method to sustain the USF, or if there are more appropriate changes that can be made. The Commission may also determine whether or not there should be federal guidelines for states to consider when reviewing applications for eligible telecommunications carrier (ETC) designations. The Commission's decisions in this proceeding can have a profound affect on how rural telephone companies will be able to continue to provide access to telecommunications and information services, including advanced services that are comparable to the services and rates in urban areas. There is much at stake and many parties are weighing in with arguments for and against the Joint Board's recommendations to the Commission in these matters.

TSTCI appreciates the efforts of the Joint Board in preparing its recommendations for the Commission on the scope of support and ETC designations. Likewise, TSTCI recognizes the Commission for the challenge it will face in making its decisions. The Commission is urged to acknowledge the special considerations Congress has given to areas served by rural telephone companies when making its decisions.

TSTCI recommends that the Commission reject the Joint Board's primary line (single connection) proposal. As many parties have demonstrated, the plan is administratively unworkable, and the costs would far outweigh the benefits. Instead, the Commission should require that support for competitive ETCs (CETCs) be based upon their own costs, not the incumbent local exchange carrier's costs as is done today

TSTCI also encourages the Commission to establish guidelines for the states when considering applications for ETC designation. These guidelines should help ensure that there is a rigorous process when making an ETC designation and public interest determination pursuant to section 214 (e). Moreover, TSTCI urges the Commission to make these guidelines mandatory rather than permissive. Also, TSTCI does not support a "streamlined" process for ETC designation that limits an affected party from participating in a proceeding.

Additionally, because the universe of telecommunications providers has expanded to include cable and Internet access providers, among others, TSTCI urges the Commission to expand the base of contributors to the USF as an equitable method to help sustain the USF.

I. THE JOINT BOARD'S RECOMMENDATION TO LIMIT SUPPORT TO PRIMARY LINES SHOULD BE REJECTED

Numerous parties filed comments in this proceeding urging the Commission to reject the Joint Board's recommendation to limit high-cost universal service support to "primary line" connections as a means to curb the growth of the universal service fund.¹ TSTCI agrees with those parties who argue that such a plan would create not only administrative problems whose costs would far outweigh the benefits, but that such a plan would have an adverse affect on network investment and broadband deployment in rural areas. As correctly stated by the Rural Telecommunications Associations (RTA):

"The statutory purpose of the high-cost universal service program is to support network infrastructure in order to ensure that telecommunications and information services in rural areas are comparable to those offered in urban areas and at affordable and comparable rates. Primary-line-based support does not relate to what it actually costs a telecommunications carrier to deploy network infrastructure. Telecommunications service providers build networks that are engineered to serve an entire area and the disconnection of a line/number by a customer does not translate into a corresponding reduction in cost for the carrier. If rural carriers receive support only for those lines/numbers designated as "primary" by the customer, they will not receive sufficient and predictable support that allows for the recovery of their costs of providing service in a high-cost area."²

Even some of those who support the primary line restriction add caveats to their support, stating that there needs to be additional work done before such a change can or should be made. For instance, the Public Utilities Commission of the State of California (CPUC) states that the definition of a "primary line" needs to be clarified. The CPUC asks, "Is a primary line only one connection to the public switched network, irrespective of how many households are at the address? Can one address have several primary lines if there are several households at that particular address? Can an address that houses several businesses but one registered owner have

¹ Includes BellSouth, NTCA, Rural Telecommunications Associations, CenturyTel, Inc., Mid-Sized Carrier Coalition, National Exchange Carrier Association, Rural Cellular Association and The Alliance of Rural CMRS Carriers, and John Staurulakis, Inc.

² Rural Telecommunications Association's Comments, pages v-vi.

several primary lines? If a household has several phone connections with different carriers...are each of these lines considered primary lines?”³ These questions posed by the CPUC demonstrate the administrative nightmare that could ensue for the carriers trying to make a determination of what constitutes a primary line.

The CPUC further states that the Commission needs to establish a process or system to ensure that high-cost support is claimed only once. The CPUC suggests that the Commission may need to maintain a master database with information from all carriers that would enable the Commission to cross check lines being claimed by ETCs. If the Commission’s intent is to limit the growth in the universal service fund through implementing support to only primary lines, it is not difficult to imagine how such a process would add significantly to the cost of administering the universal service fund. The cost of establishing and maintaining such a database alone could conceivably eliminate a significant portion of the savings to the USF. The administrative burden this would place on the ETCs, as well as the Commission, makes such a process untenable. Even though the CPUC has a program that they claim resembles the FCC’s proposal to limit support to primary lines, they acknowledge, “verifying carrier’s claims with respect to primary line designation... remains a continuing challenge.”⁴ It is conceivable that customer confusion resulting from competing carriers’ marketing efforts to be the designated “primary line carrier” would lead to a new form of slamming, forcing consumers into disputes with not one, but two or more carries to re-establish their primary line carrier relationship. Although the CPUC states that a database is being established that would make it possible to verify there is no duplication of support for a primary line, the database does not exist today, and thus, the concept is untested.

³ Comments of the People of the State of California and the Public Utilities Commission of the State of California, CC Docket No. 96-45, August 6, 2004, pages 5-6.

⁴ *Id.* at page 9.

To establish a database on a national level will be a major undertaking and it is doubtful that any benefits from such a process would outweigh the costs.

As another example, SBC Communications, who stated that they generally support limiting universal service support to primary residential and single-line business lines, advocates that this limitation be adopted only as part of more comprehensive universal service reform.⁵ This reform would include ensuring that all carriers serving high-cost areas have the pricing flexibility to fully recover the costs of providing non-primary connections and services. SBC Communications also stresses that the Commission must present a proposal for comment on how such a limitation will be implemented. This can only be done after the Commission fully explores the costs of implementing their proposal, because the costs could exceed the benefits.

TSTCI believes that limiting universal service support to primary line connections is not the appropriate way to limit the growth in the universal service fund. The Commission must look to other options.

II. SUPPORT FOR COMPETITIVE ETCS (CETC) SHOULD BE BASED UPON CETC COSTS, NOT ILEC COSTS.

The most appropriate and effective way to limit the growth in the universal service fund is to base the support each ETC receives on its own costs. A CETC should receive high cost universal service support based upon its own costs, not the ILEC's per line support as is currently done. The National Telecommunications Cooperative Association (NTCA) is correct when it states that the current FCC rules advantage classes of carriers by allowing them to receive support unrelated to their costs.⁶ Because there is no relationship between a CETC's cost and the support they receive, the current rules ignore the concept of "sufficiency" as required in

⁵ Comments of SBC Communications, Inc., page 9-10.

⁶ *NTCA Initial Comments*, CC Docket No. 96-45, August 6, 2004, Page 13.

Section 254(e) which states that universal service support should be ...”sufficient to achieve the purposes of this section.” There is a distinct possibility, and likely probability, that CETCs (specifically wireless CETCs) are receiving “excessive” funding instead of “sufficient” funding, under the current rules.

TSTCI reiterates its position as expressed to the Joint Board. Receiving universal service support based upon an ILEC’s costs creates a competitive advantage for CETCs that incur lower costs.⁷ There are many reasons why an ILEC’s cost may be higher. Wireless providers do not have the same regulatory obligations as ILECs, such as build-out requirements to serve all end users. A wireless carrier seeking ETC designation in only part of a rural telephone company’s service area, under the current rules, receives support based upon the rural ILEC’s cost of serving the entire service area, although the ETC would not incur those costs.

Some wireless carriers argue that rural wireline carriers should be required to disaggregate and target support to individual wire centers.⁸ They contend this would properly target support to high-cost areas and reduce support to competitors in low cost areas.⁹ But this argument misses the point. While disaggregation may more specifically target greater support amounts to high cost areas, it is still support based upon the ILEC’s costs. If high-cost universal support is paid to a CETC based upon its costs, disaggregation is a moot point.

While TSTCI steadfastly believes that each CETC’s actual booked investments and associated operating expenses used in the provision of service to rural customers should be taken into account when determining their universal service support amount, TSTCI does not suggest that CETCs should necessarily be held to the same accounting and separations requirements of

⁷ *Comments of TSTCI*, CC Docket No. 96-45, May 5, 2003, pages 6 – 7.

⁸ Some small rural carriers have as few as one or two exchanges. Disaggregation is not a rational solution for these small carriers.

⁹ *Comments of the Rural Cellular Association and the Alliance of Rural CMRS Carriers*, CC Docket No. 96-45, August 6, 2004.

the ILEC. A less burdensome process could be developed utilizing generally accepted accounting principles to determine the CETC's costs of providing the supported services. The process should be simple enough to calculate, based on any CETC's individual costs, but detailed enough that the cost could be verified, if the CETC requests universal service support. As TSTCI suggested to the Joint Board, one potential method could be a cost-justified "surrogate" amount calculated based on the relationship of wireless to wireline costs of service in the rural areas.

An interesting option is the interim plan proposed by the Rural Telecommunications Associations (RTA) which creates a "tiered series of ratios for determining wireless ETC support" for those wireless ETCs who choose not to report actual costs to determine its per-line high-cost support.¹⁰ The ratios serve as a "safe harbor" level of support for wireless CETCs based upon the wireline-to-wireless support ratio that applies to the particular "tier" within which each wireless CETC is placed. The tiers are based on the size of the carrier. As explained by the RTA, Tier I wireless CETCs, those with national footprints, would receive no high cost support. Tier II wireless CETCs, carriers with over 500,000 subscribers but with no national footprint, would be eligible to receive 20% of the study area average per-line support received by the ILEC. Tier III wireless CETCs, carriers that have between 100,001 and 500,000 subscribers, would be eligible to receive 40% of the study area average per-line support received by the ILEC. Tier IV wireless CETCs, carriers that have 100,000 or fewer subscribers, would be eligible to receive 80% of the study area average per line support received by the ILEC.

While TSTCI may support the surrogate concept as an alternative to the development of specific cost allocation standards applied to wireless carriers, TSTCI does not believe the reports used by RTA to develop their comparative cost analyses were intended for the purpose used.

¹⁰ Comments of the Rural Telecommunications Associations, CC Docket No. 96-45, August 6, 2004.

TSTCI recommends that further study be conducted before utilizing the surrogate percentages presented by RTA.

III. THE COMMISSION SHOULD ADOPT THE JOINT BOARD'S PROPOSED GUIDELINES AS MANDATORY REQUIREMENTS FOR ETC DESIGNATION AS WELL AS THREE ADDITIONAL REQUIREMENTS

TSTCI supports the minimum guidelines proposed by the Joint Board for regulatory bodies to consider when making a determination to grant ETC designation. In addition, TSTCI supports the adoption of three other guidelines that have been proposed by the NTCA and the RTA. However, TSTCI urges the Commission to make these guidelines *mandatory* rather than *permissive* guidelines which the states may choose to follow or ignore. The Joint Board called for a “particularly rigorous standard” of review for ETC applications in rural study areas. Adopting mandatory guidelines will indeed be supportive of a rigorous standard of review. Also, as the National Exchange Carrier Association, Inc. (NECA) correctly stated, “With permanent mandatory guidelines, state ETC designation processes would more closely resemble those employed by the FCC when a state commission has no, or declines, jurisdiction. States could still add ETC designation requirements that do not conflict with the federal requirements.”¹¹

The guidelines proposed by the Joint Board and supported by TSTCI are: 1.) Adequate Financial Resources; 2.) Commitment and Ability to Provide the Supported Services; 3.) Ability to Remain Functional in Emergencies; 4.) Customer Protection; and 5.) Local Usage.

1. Adequate Financial Resources

The Commission has recommended that guidelines be established for states to evaluate whether ETC applicants have the financial resources and ability to provide quality services

¹¹ *Comments of the National Exchange Carrier Association Inc.*, CC Docket No. 96-45, August 6, 2004 Page 19.

throughout the designated service area.¹² The Rural Cellular Association and The Alliance of Rural CMRS Carriers argue that imposing such a standard is not competitively neutral, and if it is imposed, then all ETCs must be reviewed as well, on the same basis as new entrants.¹³ TSTCI responds that competitive neutrality requires that wireless ETCs be subject to the same financial standards required of other telecommunications providers for state certification. Financial qualifications are a part of the certification process in Texas, as in many other states. If telecommunications providers (i.e., ILECs and CLECs) must comply with basic financial standards, it is only reasonable that wireless carriers seeking ETC designation be held to the same standards. The Nebraska Rural Independent Companies assert that all ETCs should be subject to state certification, including the requirement of demonstrating financial ability to meet universal service obligations.¹⁴ TSTCI is not advocating that wireless ETCs must obtain state certification; however, TSTCI does believe that the same standards for demonstrating financial ability that apply to telecommunications providers seeking state certification should be considered as part of the ETC designation process for wireless carriers.

2. Commitment and Ability to Provide the Supported Services

TSTCI agrees with the Joint Board recommendation to the Commission that state commissions should be encouraged to require ETC applicants to demonstrate their capability and commitment to provide service throughout the designated service area to all customers who make a reasonable request for service. (As stated previously, TSTCI believes this should be a mandatory requirement for ETC designation in rural areas.) Several commenters advocated that ETC applicants file a formal build-out plan for areas where facilities have not yet been built, to

¹² TSTCI believes that the financial showing to be required of any ETC should be based on its financial ability to meet the public interest with USF support.

¹³ Comments of Rural Cellular Association and The Alliance of Rural CMRS Carriers, page 29.

¹⁴ Comments of The Nebraska Rural Independent Companies, page 8.

demonstrate their commitment to provide service throughout the designated service area.¹⁵

TSTCI agrees that the use of a build-out plan is a reasonable way to ensure than an ETC applicant is willing and able to provide the supported services throughout the designated service area. Although the Commission may choose not to specifically require build-out plans as part of the mandatory requirement for an ETC applicant to demonstrate commitment, TSTCI strongly urges the Commission to require that ETC applicants demonstrate their commitment and ability to provide the supported services throughout the designated service area. Furthermore, the Commission should establish a requirement to audit the commitment.

3. Ability to Remain Functional in Emergency Situations

An important public interest consideration is the ability of an ETC to remain functional in emergency situations. As the Joint Board quoted in its *Recommended Decision*, the “security of a carrier’s network and the ability to protect critical telecommunications infrastructure should be a major consideration in evaluating the public interest.”¹⁶ TSTCI agrees with NTCA that the ability of an ETC to remain functional in emergency situations is essential to public safety and national security and must be considered as part of the public interest determination.¹⁷

4. Consumer Protection

The Joint Board has recommended that states may impose consumer protection requirements as part of the ETC designation process. The National Association of State Utility Consumer Advocates (NASUCA) has responded by stating that ETCs “should be required to submit to the regulatory authority of the states and be subject to the consumer protection rules, including billing and collection rules, that apply to ILECs in the state. CETCs may be granted

¹⁵ NTCA’s comments, page 17; RTA’s comments, page 33; The Nebraska Rural Independent Companies, pages 8-9.

¹⁶ In the Matter of Federal-State Joint Board on Universal Service, *Recommended Decision*, CC Docket No. 96-45, Released February 27, 2004, para. 61.

¹⁷ NTCA’s comments, page 20.

waivers from any rules that are not practical with respect to the technology they employ.”¹⁸

TSTCI agrees that the regulatory authority should consider consumer protections when making a determination regarding ETC designation. Which consumer protections are appropriate can be decided by the individual states. For instance, in Texas there are separate rules pertaining to billing and collections, specific to dominant carriers and non-dominant carriers, with the exception of wireless carriers. The state commission can, and should determine which consumer protection rules, if any, are necessary for wireless ETC designation. Consumer protections should be a mandatory requirement when deciding upon ETC designation, not only for the benefit of the consumer but to ensure the rules are competitively neutral.

5. Local Usage

Local usage is one of the supported services that ETCs are required to provide in order to receive federal universal service support. TSTCI recommends that states consider a minimum amount of local usage ETCs should offer as a condition of federal universal service support.

TSTCI supports additional guidelines proposed by the NTCA and RTA for public interest determinations when considering ETC applications in a rural service area as follows:

6. The Applicant Must Demonstrate Its Commitment to Utilize the Funding It Receives Only to Support Infrastructure and Supported Services Within the ETC Designated Service Area.

As the NTCA and RTA state, since a rural ILEC’s support is based upon actual past investments and expenses, it can be easily determined that the universal service support is being used to provide the supported services within the ILEC’s service area. This is not the case with CETCs who are only required to file a letter certifying that the support they received is being used for its intended purpose. Both the NTCA and RTA cited the Commission’s recent decision

¹⁸ Comments of the National Association of State Utility Consumer Advocates, page 39.

in two ETC designation proceedings (Virginia Cellular, LLC¹⁹ and Highland Cellular, Inc.²⁰) where it stated that an inquiry could be initiated to examine any ETC's records to ensure that its high-cost support is used for its intended purposes and in the areas where it is designated an ETC.²¹ TSTCI urges the Commission to require an ETC applicant, as a condition for ETC designation, to make a demonstration of its commitment to utilize high-cost support funding to support the infrastructure within the ETC designated service area.

7. The Impact of the Designation on the Size and Sustainability of the Universal Service Fund Must be Considered.

TSTCI agrees with the NTCA and RTA's recommendations that the state commissions and the FCC consider the sustainability of the high-cost universal service program as they evaluate CETC applications for rural service areas. It is imperative that the regulatory bodies determine if it is in the public interest to support multiple carriers in areas that are "prohibitively expensive for even one provider." Although the Joint Board did not recommend a specific cost/benefit test, they did recommend that state commissions could consider the level of high-cost per-line support to be received by an ETC. TSTCI joins the NTCA and RTA in support of this recommendation.

8. Regulators Must Continue to Analyze Whether or Not ETC Designation Would Create the Potential for Rural Creamskimming.

TSTCI joins the NTCA and RTA in support of the Joint Board's recommendation that study area-wide service should be the norm in the areas served by rural telephone companies. Before granting ETC designation to a carrier below the study area level, it is imperative that a

¹⁹ *Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum and Order, Released January 22, 2004

²⁰ *Federal-State Joint Board on Universal Service, Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum and Order, Released April 12, 2004

²¹ RTA's comments, page 35 and NTCA's comments, page 20.

separate public interest determination be made in that regard. It is necessary for regulators to analyze whether or not an ETC designation for a service area less than the study area of a rural ILEC would allow creamskimming by allowing the applicant to serve only the low-cost, high-revenue customers in a rural telephone company's service area.

The Commission concluded in the Virginia Cellular, LLC order²² and the Highland Cellular, Inc.²³ order that a competitor's request for universal service funding eligibility should be denied where, if granted, a rural carrier's ability to continue to provide universal service would be jeopardized. In these cases, the Commission concluded that to the extent the applicant sought to provide services only within low-cost, higher-density portions of wire centers, the applications should be denied. The Commission found that designating Virginia Cellular as an ETC only within a portion of one low-cost, high-density wire center could "potentially significantly undermine" the rural telephone company's ability to serve its entire service area. The Commission also determined that incumbents cannot, in all instances, protect against creamskimming by disaggregating high-cost support. As stated in the Recommended Decision, the Commission recognized "that creamskimming may still be a concern where a competitor proposes to serve only the low-cost areas of the rural carrier's study area to the exclusion of the high-cost areas."²⁴

²² *Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum and Order, Released January 22, 2004.

²³ *Federal-State Joint Board on Universal Service, Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, Memorandum and Order, Released April 12, 2004.

²⁴ Recommended Decision, CC Docket No. 96-45, FCC 043-1, para. 85.

TSTCI requests that the Commission reaffirm the Joint Board's recommendation that the procedures established in 1997 for service area redefinition be retained and that smaller service areas be designated only after careful analysis of the creamskimming potential of the applicant.²⁵

IV. TSTCI OPPOSES ANY ETC DESIGNATION PROCESS THAT ADVERSELY IMPACTS THE RIGHTS OF AN INTERESTED PARTY TO PARTICIPATE IN A PROCEEDING

The RTA advocates a “streamlined” ETC application process for Tier IV wireless carriers (100,000 or fewer subscribers) in both rural and non-rural service areas. The RTA contends that given the public benefit of small wireless carriers providing service in rural markets, there should be processing procedures that streamline the information Tier IV carriers are required to submit, as well as a specific timeframe to resolve the ETC application in order to reduce the costs associated with defending the application.²⁶ TSTCI does not necessarily oppose the processing of ETC applications as soon as reasonably possible (as suggested by RTA). However, TSTCI strongly opposes any process that by rule excludes an interested party to have full recourse to intervene, file comments, or take other appropriate action normally afforded during a comparable regulatory proceeding. The rights of an interested or affected party cannot be excluded in the interest of “streamlining” a process.

V. THE BASE OF USF CONTRIBUTORS SHOULD BE EXPANDED

Although not specifically addressed in this Notice of Proposed Rulemaking, NTCA included in its comments the recommendation that the Commission expand the list of USF contributors to include both facilities-based and non-facilities based VoIP/IP-enabled service

²⁵ Id. at para. 86

²⁶ RTA's Comments, pages 30-31.

providers and all cable, wireless and satellite providers of broadband Internet access and other providers that connect to or benefit from connection to the public, regardless of the classification of the service as an information service, telecommunications service or private carriage service.²⁷ This recommendation had previously been made in the proceeding before the Commission regarding IP-enabled services.²⁸ In that proceeding, TSTCI concurred with NTCA on the need for expanding the base of contributors.

NTCA explains that the universe of telecommunications providers has expanded beyond those that existed when contributors to the USF were first identified by the commission. NTCA contends that the base of contributors should be expanded to ensure that contributions are made on an equitable and nondiscriminatory basis. They suggest that the contribution base be re-examined to “ensure that the Commission does not act precipitously in adopting the primary line restriction as the total cure for maintaining the viability of the fund.” Again, TSTCI supports NTCA’s position and urges the Commission to consider broadening the base of contributors to the USF as an equitable method to help sustain the viability of the USF.

VI. SUMMARY

TSTCI urges the Commission to reject the Joint Board’s recommendation on “primary lines” and more appropriately and effectively limit the growth in the high-cost universal service fund by basing support upon each ETC’s own costs.

TSTCI supports mandatory eligibility requirements and public interest tests for CETC applications in rural areas, including the guidelines recommended by the Joint Board. Moreover, TSTCI urges the Commission to expand the public interest test to consider 1.) the ETC

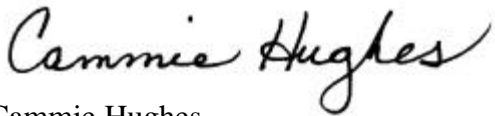
²⁷ NTCA’s Comments, page 24.

²⁸ In the Matter of IP-Enabled Services, WC Docket No. 04-36, Initial Comments of the National Telecommunications Cooperative Association, May 28, 2004.

applicant's commitment to use USF funding only to support the infrastructure within the ETC's designated service area; 2.) the impact of the designation on the USF; and 3.) whether or not ETC designation would create the potential for rural creamskimming. TSTCI does not support a "streamlined" process that limits an affected party from participating in a proceeding.

TSTCI also joins NTCA in urging the Commission to expand the base of USF contributors to include all cable, wireless and satellite providers of broadband Internet access and facilities-based and non-facilities-based VoIP and IP-enabled service providers.

Respectfully submitted,

A handwritten signature in black ink that reads "Cammie Hughes". The signature is written in a cursive, flowing style.

Cammie Hughes
Authorized Representative
Texas Statewide Telephone Cooperative, Inc.

TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.

Brazos Telecommunications, Inc.
Brazos Telephone Coop., Inc.
Cameron Telephone Company
Cap Rock Telephone Coop., Inc.
Central Texas Telephone Coop., Inc.
Coleman County Telephone Coop., Inc.
Colorado Valley Telephone Coop., Inc.
Comanche County Telephone Company, Inc.
Community Telephone Company, Inc.
Cumby Telephone Coop., Inc.
Dell Telephone Coop., Inc.
E.N.M.R. Telephone Coop., Inc.
Eastex Telephone Coop., Inc.
Electra Telephone Company
Etex Telephone Coop., Inc.
Five Area Telephone Coop., Inc.
Ganado Telephone Company, Inc.
La Ward Telephone Exchange, Inc.
Lake Livingston Telephone Company
Lipan Telephone Company
Livingston Telephone Company
Mid-Plains Rural Telephone Coop., Inc.
Nortex Communications, Inc.
North Texas Telephone Company
Panhandle Telephone Coop., Inc.
Peoples Telephone Coop., Inc.
Poka Lambro Telephone Coop., Inc.
Riviera Telephone Company, Inc.
Santa Rosa Telephone Coop., Inc.
South Plains Telephone Coop., Inc.
Tatum Telephone Company
Taylor Telephone Coop., Inc.
Wes-Tex Telephone Coop., Inc.
West Plains Telecommunications, Inc.
West Texas Rural Tel. Coop., Inc.
XIT Rural Telephone Coop., Inc.